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8 *Tesla, Inc.*

9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 NICHOLAS YEATREKAS, an individual,  
12 Plaintiff,  
13 vs.  
14 TESLA, INC., a Foreign Company,  
15 Defendants.

Case No. 3:22-cv-00114-LRH-CLB

**STIPULATION TO EXTEND  
DEADLINE FOR DEFENDANT TO  
RESPOND TO PLAINTIFF'S  
COMPLAINT  
(FIRST REQUEST)**

16 IT IS HEREBY STIPULATED by and between Plaintiff Nicholas Yeatrekas ("Plaintiff"),  
17 through his counsel The Geddes Law Firm, P.C., and Defendant Tesla, Inc. ("Defendant"), through  
18 its counsel Jackson Lewis P.C., that Defendant shall have an extension up to and including June 21,  
19 2022, in which to file a response to Plaintiff's Complaint. This Stipulation is submitted and based  
20 upon the following:

- 21 1. Defendant's response to the Complaint is currently due on June 13, 2022.
- 22 2. On May 31, 2022, Defendant informed Plaintiff of its intent to file a motion to  
23 compel arbitration if Plaintiff did not voluntarily dismiss this matter.
- 24 3. On June 1, 2022, Plaintiff's counsel requested additional time to discuss the  
25 arbitration issue with her client. The parties agreed Plaintiff would have up to and including June  
26 10, 2022, to provide a response to Defendant's arbitration decision.
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1           4.       During the June 1, 2022, conversation, counsel agreed to extend the deadline to  
2 respond to the Complaint until June 21, 2022, to allow the parties additional time to discuss the  
3 merits of the arbitration issue.

4           5.       This is the first request for an extension of time for Defendant to file a response to  
5 Plaintiff's Complaint.

6           6.       This request is made in good faith and not for the purpose of delay.  
7           Nothing in this Stipulation, nor the fact of entering to the same, shall have the effect of or  
8 be construed as waiving any claim or defense held by any party hereto.

9           Dated this \_\_\_\_ day of June, 2022.

10          THE GEDDES LAW FIRM, P.C.

JACKSON LEWIS P.C.

11  
12          /s/Kristen R. Geddes

/s/ Deverie J. Christensen

KRISTEN R. GEDDES

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15          *Attorney for Plaintiff*

*Attorneys for Defendant*

16          *Nicholas Yeatrekas*

*Tesla, Inc.*

17  
18                   **ORDER**

19                   IT IS SO ORDERED:

20                     
21                   United States Magistrate Judge

22                   Dated: June 13, 2022  
23

24                   4857-6221-9044, v. 1  
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